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14	UNITED STATES DISTRICT COURT	
	DISTRICT OF NEVADA	
15	DISTRICT	OF NEVADA
15 16	DISTRICT UNITED STATES OF AMERICA,	OF NEVADA CASE NO. 2:14-cr-00194-JAD-NJK
		CASE NO. 2:14-cr-00194-JAD-NJK DEFENDANTS' EMERGENCY MOTION
16	UNITED STATES OF AMERICA,	CASE NO. 2:14-cr-00194-JAD-NJK DEFENDANTS' EMERGENCY MOTION TO EXTEND TIME TO COMPLY WITH CONDITION OF SUPERVISED
16 17	UNITED STATES OF AMERICA, Plaintiff,	CASE NO. 2:14-cr-00194-JAD-NJK DEFENDANTS' EMERGENCY MOTION TO EXTEND TIME TO COMPLY WITH
16 17 18	UNITED STATES OF AMERICA, Plaintiff, vs.	CASE NO. 2:14-cr-00194-JAD-NJK DEFENDANTS' EMERGENCY MOTION TO EXTEND TIME TO COMPLY WITH CONDITION OF SUPERVISED
16 17 18 19	UNITED STATES OF AMERICA, Plaintiff, vs. CHARLES COBB, et. al, Defendants.	CASE NO. 2:14-cr-00194-JAD-NJK DEFENDANTS' EMERGENCY MOTION TO EXTEND TIME TO COMPLY WITH CONDITION OF SUPERVISED RELEASE
16 17 18 19 20	UNITED STATES OF AMERICA, Plaintiff, vs. CHARLES COBB, et. al, Defendants. This is Defendants' EMERGENCY MOT	CASE NO. 2:14-cr-00194-JAD-NJK DEFENDANTS' EMERGENCY MOTION TO EXTEND TIME TO COMPLY WITH CONDITION OF SUPERVISED RELEASE TON TO EXTEND TIME for complying with the
16 17 18 19 20 21	UNITED STATES OF AMERICA, Plaintiff, vs. CHARLES COBB, et. al, Defendants. This is Defendants' EMERGENCY MOT	CASE NO. 2:14-cr-00194-JAD-NJK DEFENDANTS' EMERGENCY MOTION TO EXTEND TIME TO COMPLY WITH CONDITION OF SUPERVISED RELEASE
16 17 18 19 20 21 22	UNITED STATES OF AMERICA, Plaintiff, vs. CHARLES COBB, et. al, Defendants. This is Defendants' EMERGENCY MOT	CASE NO. 2:14-cr-00194-JAD-NJK DEFENDANTS' EMERGENCY MOTION TO EXTEND TIME TO COMPLY WITH CONDITION OF SUPERVISED RELEASE TON TO EXTEND TIME for complying with the At Defendants' June 12, 2014 initial appearance,
16 17 18 19 20 21 22 23 24 25	UNITED STATES OF AMERICA, Plaintiff, vs. CHARLES COBB, et. al, Defendants. This is Defendants' EMERGENCY MOT firearm removal condition of supervised release. Magistrate Hoffman ordered Defendants to remo	CASE NO. 2:14-cr-00194-JAD-NJK DEFENDANTS' EMERGENCY MOTION TO EXTEND TIME TO COMPLY WITH CONDITION OF SUPERVISED RELEASE TON TO EXTEND TIME for complying with the At Defendants' June 12, 2014 initial appearance,
16 17 18 19 20 21 22 23 24 25 26	UNITED STATES OF AMERICA, Plaintiff, vs. CHARLES COBB, et. al, Defendants. This is Defendants' EMERGENCY MOT firearm removal condition of supervised release. Magistrate Hoffman ordered Defendants to remo	CASE NO. 2:14-cr-00194-JAD-NJK DEFENDANTS' EMERGENCY MOTION TO EXTEND TIME TO COMPLY WITH CONDITION OF SUPERVISED RELEASE TON TO EXTEND TIME for complying with the At Defendants' June 12, 2014 initial appearance, ve all guns and dangerous weapons from their fully request the Court to extend the gun-removal
16 17 18 19 20 21 22 23 24 25	UNITED STATES OF AMERICA, Plaintiff, vs. CHARLES COBB, et. al, Defendants. This is Defendants' EMERGENCY MOT firearm removal condition of supervised release. Magistrate Hoffman ordered Defendants to remo homes within 48 hours. Defendants now respect	CASE NO. 2:14-cr-00194-JAD-NJK DEFENDANTS' EMERGENCY MOTION TO EXTEND TIME TO COMPLY WITH CONDITION OF SUPERVISED RELEASE TON TO EXTEND TIME for complying with the At Defendants' June 12, 2014 initial appearance, ve all guns and dangerous weapons from their fully request the Court to extend the gun-removal

LEWIS BRISBOIS BISGAARD & SMITH LLP ATTORNEYS AT LAW

Nature of the emergency

As noted above, the current deadline for Defendants to remove all guns from their homes is around 3:00 PM tomorrow. Accordingly, Defendants request the Court to address this motion for an extension on an emergency basis.

ii. Argument

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Courts may amend conditions of supervised release under the Bail Reform Act. See 18 U.S.C. § 3142 (c)(3). Because relocation of Defendants' collectible guns by 3:00 PM tomorrow, June 14, is logistically impossible, Defendants request an extended period of two weeks from their initial appearance in which to remove the guns. Mr. Cobb is a gun collector, and has dozens of guns stored securely in a number of safes. Relocation of the guns will require obtaining suitable and adequate space, as well as arranging for specialized moving services for transport of the safes. Accordingly, relocation of the guns by tomorrow is not possible. Defendants therefore respectfully request until and including June 26, 2014 to relocate the guns.

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Defendants again reiterate that Pretrial Services does not oppose this request. Defendants 1 2 additionally represent that the Government does not oppose an extension of one week, up to and 3 including June 19, 2014. 4 Respectfully submitted this 13th day of June, 5 6 By: /s/ Kathleen Bliss Kathleen Bliss 7 Bar No. 7606 Lewis Brisbois Bisgaard & Smith LLP 8 6385 S. Rainbow Blvd, Suite 600 Las Vegas NV., 89118 9 702-693-4336, Ext.: 4336 10 /s/ John Kinchen By: ___ 11 John Kinchen State Bar No. 00791027 12 Fed. I.D. No. 18184 13 jkinchen@hakllp.com Hughes Arrell Kinchen LLP 14 1221 McKinney, Suite 3150 Houston, TX 77010 15 Telephone: (713) 403-2064 Facsimile: (713) 568-1747 16 17 IT IS SO ORDERED that Defendants shall have until June 26, 2014 to comply with the 18 firearms relocation condition of their supervised release. 19 DATED this ____ day of June 2014 20 21 22 U.S. MAGISTRA 23 24 25 26 27 28



CERTIFICATE OF SERVICE 1 2 I hereby certify that a true and correct copy of the foregoing: 3 **DEFENDANTS' EMERGENCY MOTION TO EXTEND TIME** 4 TO COMPLY WITH CONDITION OF SUPERVISED RELEASE in sealed district court case 2:14-cv-00781-JAD-VCF, was filed with the clerk of the court on 6 Friday, June 13, 2014, and was served to the following parties via email and hand-delivery on 7 June 13, 2014: 8 Andrew Duncan Cristina Silva Assistant U.S. Attorney Assistant U.S. Attorney U.S. Attorney's Office U.S. Attorney's Office 10 333 Las Vegas Boulevard South 333 Las Vegas Boulevard South 11 **Suite 5000 Suite 5000** Las Vegas, NV 89101 Las Vegas, NV 89101 12 Cristina.Silva@usdoj.gov Andrew.Duncan@usdoj.gov 13 14 Terry Wheaton **United States Pretrial Services** 15 333 Las Vegas Boulevard South Suite 1112 16 Las Vegas, NV 89101 17 via facsimile 702-464-5631 /s/ Kathleen Bliss 18 Kathleen Bliss 19 20 21 22 23 24 25 26 27 28

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